

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

ROBERT W. CLOUGH, II, on behalf of  
himself and others similarly situated,

Plaintiff,

v.

REVENUE FRONTIER, LLC,  
SUPREME DATA CONNECTIONS, LLC, and  
WILLIAM ADOMANIS,

Defendants.

Civil Action No. 1:17-cv-00411-PB

REVENUE FRONTIER, LLC,

Cross-Claimant,

v.

SUPREME DATA CONNECTIONS, LLC and  
WILLIAM ADOMANIS,

Cross-Defendants.

**THE PARTIES' SUBMISSION ON CLASS ADMINISTRATOR AND SCHEDULE FOR  
SETTLEMENT DEADLINES**

Plaintiff Robert Clough and defendants Revenue Frontier, LLC, Supreme Data Connections, LLC and William Adomanis ( collectively “the Parties”) make the following submission as ordered by the Court in its *Endorsed Order Re [125] Assented to Motion for Preliminary Approval of Class Action Settlement*, dated March 4, 2020. In its Endorsed Order, the Court directed the Parties to: ***1) meet and confer and agree on a proposed claims administrator; (2) inform the court of the identity and qualifications of the proposed claims administrator and the terms under which the administrator will serve and (3) provide the court with a joint proposed schedule specifying each date that***

*should be referenced in the court's order preliminarily approving the proposed settlement..* The parties respond as follows:

1. The Parties have meet and conferred as directed, and agree that AB Data, Ltd. is qualified to administer the settlement of this action.
2. Attached hereto as Exhibit 1 is a declaration of Eric Schacter of AB Data, Ltd. setting forth AB Data's extensive experience administering class actions. Mr. Schacter also sets forth the terms of AB Data's engagement for the administration.
3. A complete proposed Preliminary Approval Order is attached hereto, with dates inserted assuming entry of a preliminary approval order by Friday, March 27, 2020. For ease of reference, the operative dates are as follows:

<b>May 11, 2020</b>	Deadline for notice to be provided in accordance with the Class Action Settlement Agreement and Release ("Agreement") and this Order (Notice Deadline)
<b>June 10, 2020</b>	Deadline for filing of Plaintiff's Motion for Attorneys' Fees and Costs and Incentive Award
<b>August 10, 2020</b>	Deadline to file objections or submit requests for exclusion (Opt-Out and Objection Deadline)
<b>August 10, 2020</b>	Deadline for Settlement Class Members to Submit a Claim Form (Claim Period)
<b>August 20, 2020</b> [100 days after the Notice deadline]	Deadline to File Motion for Final Approval
<b>August 17, 2020</b> [7 Days After the Opt Out Deadline]	Deadline for Settlement Administrator to Provide Class Counsel with Proof of Class Notice, Identifying the Number of Requests for Exclusion, and Number of Claims Received
<b>August 28, 2020</b> [10 Days Prior to Final Approval Hearing]	Class Counsel Shall File with the Court One or More Declarations Stating that They Have Complied with Their CAFA Notice Obligations
<b>September 9, 2020, 2020 at 2p.m.</b> [Or any date convenient for the Court after September 9, 2020]	Final Approval Hearing

Dated: March 18, 2020

Respectfully submitted,

/s/ Edward A. Broderick

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/s/ William Adomanis

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### **CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically served the foregoing, on all counsel of record via the Court's CM/ECF system, pursuant to Fed. R. Civ. P. 5(b)(2)(E) and via email to William Adomanis and Supreme Data Connections, LLC.

Dated: March 18, 2020

/s/ Edward A. Broderick  
Edward A. Broderick